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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

GABRIELLE CLARK; and WILLIAM
CLARK,

Plaintiffs,

vs.

DEMOCRACY PREP PUBLIC SCHOOLS,
Inc.; and DEMOCRACY PREP NEVADA
LLC; and DEMOCRACY PREP AGASSI
CAMPUS; and NATASHA TRIVERS, in her
capacity as CEO of Democracy Prep Public
Schools, Inc.; and KIMBERLY WALL, in her
capacity as assistant superintendent of
Democracy Prep Public Schools, Inc.; and
ADAM JOHNSON, in his capacity as executive
director of Democracy Prep Agassi Campus;
and KATHRYN BASS, in her capacity as a
teacher at Democracy Prep Agassi Campus; and
JOSEPH MORGAN, in his capacity as
president of Democracy Prep Agassi Campus;
and REBECCA FEINEN, in her capacity as the
Executive Director of the State Public Charter
School Authority; and MELISSA MACKEDON
(chair), RANDY KIRNER (vice chair),
SHELIA MOULTON, SAMI RANDOLPH,
MALLORY CYR, TONIA HOLMES-
SUTTON, DON SOIFER, TAMIKA
SHAUNTEE ROSALES, LEE FARRIS, in their
capacities as members of the State Public
Charter School Authority

Defendants.

CASE NO. 2:20-cv-02324-APG-VCF

**PLAINTIFFS' MOTION TO
EXCEED PAGE LIMIT FOR
OPPOSITION TO DEMOCRACY
PREP DEFENDANTS' MOTION TO
DISMISS**

1 Plaintiffs Gabrielle Clark and William Clark ("Plaintiffs") hereby move to exceed the
2 twenty-four (24)-page limit set by LR 7-3(b) by ten (10) additional pages (for a total of thirty-four
3 (34) pages) for their opposition to the Democracy Prep Defendants' Motion to Dismiss [ECF No.
4 114] ("Motion to Dismiss"), which is due on July 2, 2021.

5 Good cause exists to exceed the page limit because Plaintiffs cannot adequately or fully
6 respond to the Motion to Dismiss, which is 30 pages and concerns twelve (12) separate causes of
7 action, without exceeding the page limit set forth in LR 7-3(b). Good cause is present because this
8 matter involves complex issues involving constitutional and statutory law and predicate issues of
9 mootness and governmental immunity. Finally, this Court previously granted the Democracy Prep
10 Defendants' Motion to Exceed Page Limit for Their Motion to Dismiss [ECF No. 107]. *See*
11 Minute Order in Chambers [ECF No. 109]. Counsel for Democracy Prep Defendants has
12 consented to Plaintiffs' request to exceed as well.

13 Accordingly, for the foregoing reasons, Plaintiffs respectfully request that the Court grant
14 permission for Plaintiffs to exceed the page limit for their opposition to the Motion to Dismiss.

15 DATED this 25th day of June, 2021.

16 **LITIGATOR LAW**

17
18 By /s/ William D. Schuller, Esq.
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20 Nevada Bar No. 000848
21 WILLIAM D. SCHULLER, ESQ.
22 Nevada Bar No. 011271
23 11830 Tevare Lane #1062
24 Las Vegas, Nevada 89138

25 Attorneys for Plaintiffs

26 IT IS SO ORDERED:

27 Dated: June 28, 2021

28

ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE